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BEFORE THE  
**FEDERAL COMMUNICATIONS COMMISSION**  
WASHINGTON, D.C.

IN THE MATTER OF  
AMENDMENT OF SECTION 73.202(b)  
TABLE OF ALLOTMENTS,  
FM BROADCAST STATIONS  
(THORNDALE, TEXAS)

MM Docket No. 99-243  
RM-9675

**RECEIVED**

AUG 2 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: The Chief, Allocations Branch

**PETITION FOR RECONSIDERATION**

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August 2, 1999

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## **TABLE OF CONTENTS**

I.	INTRODUCTION .....	1
II.	ARGUMENT .....	2
A.	The Allocations Branch Erred in Issuing an NPRM Containing a Proposal that is Mutually Exclusive with an Existing Construction Permit.....	2
B.	The NPRM Erred in Finding That HCBI Provided Sufficient Information to Permit Reservation of Commercial Channel 286A at Thorndale for Noncommercial Use .....	3
III.	CONCLUSION.....	6

## **SUMMARY**

This is a Petition for Reconsideration filed by Cameron Broadcasting Company ("Cameron Broadcasting") in connection with Notice of Proposed Rule Making, DA 99-1292, released July 2, 1999 in MM Docket No. 99-243, RM-9675 ("NPRM").

Cameron Broadcasting argues in this Petition that the Allocations Branch erred in issuing an NPRM containing a proposal that is mutually exclusive with its own existing construction permit for Channel 286C3 at Cameron, Texas. The Allocations Branch lacks authority to issue an NPRM containing a proposal that is in direct conflict with an existing construction permit. Additionally, the NPRM erred in finding that HCBI provided sufficient information to permit reservation of commercial Channel 286A at Thorndale for noncommercial use. As such, the HCBI petition for rule making was fatally defective as filed and should not have been accepted for rule making.

As a result of the above, the NPRM was issued in error and must be rescinded.

BEFORE THE  
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IN THE MATTER OF  
AMENDMENT OF SECTION 73.202(b)  
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FM BROADCAST STATIONS  
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MM Docket No. 99-243  
RM-9675

To: The Chief, Allocations Branch

**PETITION FOR RECONSIDERATION**

Cameron Broadcasting Company ("Cameron Broadcasting"), permittee of KHTZ(FM), Cameron, Texas, by counsel, pursuant to 47 CFR §1.429 respectfully submits its *Petition for Reconsideration* seeking reconsideration of the Notice of Proposed Rule Making, DA 99-1292, released July 2, 1999 in MM Docket No. 99-243, RM-9675 ("NPRM"). In support thereof, the following is stated:

**I. INTRODUCTION**

1. On March 12, 1999, the Commission granted a one-step application to Cameron Broadcasting to upgrade its facilities at Cameron, Texas from Channel 232A to Channel 286C3. See, Broadcast Actions, Report No. 44450, March 17, 1999.

2. On April 16, 1999, Houston Christian Broadcasters, Inc. ("HCBI") filed a Petition for Reconsideration of the Commission's grant with the Mass Media Bureau. As of this date, however, the Commission has taken no action on the HCBI Petition and, therefore, Cameron Broadcasting continues to hold a valid construction permit for Channel 286C3 at Cameron, Texas.

3. On July 2, 1999, the Allocations Branch released the NPRM. The allotment of Channel 286A at Thorndale, Texas as proposed in the NPRM in this proceeding is mutually exclusive with Cameron Broadcasting's existing construction permit.<sup>1</sup> Consequently, the NPRM was issued in error and must be rescinded.<sup>2</sup>

## **II. ARGUMENT**

### **A. The Allocations Branch Erred in Issuing an NPRM Containing a Proposal that is Mutually Exclusive with an Existing Construction Permit**

4. Nowhere in the Commission's rules or precedent is there a provision that contemplates the Allocations Branch issuing an NPRM that proposes an allotment that is in direct conflict with an existing construction permit. Nevertheless, the NPRM does not even mention the interests of Cameron Broadcasting. The proposal outlined in the NPRM for a new FM facility on Channel 286A at Thorndale, Texas was never made public in the Commission's FM engineering database at any time relevant to this proceeding. These are substantial errors that require that the NPRM be rescinded.

5. With the grant of the Cameron Broadcasting construction permit, its former channel (232A) was deleted from the Commission's FM engineering database.<sup>3</sup> Given this deletion, Cameron Broadcasting will have no choice but to broadcast on the channel authorized by its construction permit, Channel 286C3.

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<sup>1</sup> Engineering Statement of Doug Vernier, attached hereto as Exhibit 1, p. 1.

<sup>2</sup> Cameron Broadcasting is simultaneously requesting a stay of the NPRM in order to minimize any disruption caused by the release of the NPRM.

<sup>3</sup> See, Channel Study, attached hereto as Exhibit 2.

6. Cameron Broadcasting is not the only party injured by the release of the NPRM. Shortly after the grant of the Cameron Broadcasting construction permit, May Broadcasting, Inc. filed to upgrade FM station KULF at Brenham, Texas from Channel 231C3 to Channel 231C2 (BMPH-990405IA). This application was accepted for tender by the Commission on April 16, 1999.<sup>4</sup> This application precludes Cameron Broadcasting from returning to Channel 232A since that would be in conflict with the May Broadcasting facility as a first adjacency. Therefore, the proposal contained in the NPRM is in conflict with two the upgrades involving two commercial FM stations, KHTZ and KULF.

7. As will be demonstrated below, the petition that initiated this proceeding was facially deficient at the time it was filed.<sup>5</sup> Hence, it was not published in the Commission's allotment database. For this defective proposal to surface now, following the grant of a mutually exclusive construction permit and the acceptance for tender of still another one-step upgrade, is clear error. Therefore, the NPRM must be rescinded.

**B. The NPRM Erred in Finding That HCBI Provided Sufficient Information to Permit Reservation of Commercial Channel 286A at Thorndale for Noncommercial Use**

8. As pointed out in the NPRM, HCBI is one of six mutually exclusive applicants competing for commercial Channel 257A at Thorndale, Texas.<sup>6</sup> It is the only one, however, proposing to use Channel 257A for noncommercial use. In an effort to extricate itself from the Thorndale proceeding, HCBI proposed in

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<sup>4</sup> See, Broadcast Applications, Report No. 24472.

<sup>5</sup> See 47 CFR §1.401(e) (Petitions which are moot, premature, repetitive, frivolous, or which plainly do not warrant consideration by the Commission may be denied or dismissed without prejudice to the petitioner).

the instant Petition for Rule Making to allot Channel 286A at Thorndale, reserve its use for noncommercial purposes and amend its application for Channel 257A accordingly.<sup>7</sup> Notwithstanding the representations made in HCBI's Petition for Rule Making, reservation of the channel for noncommercial use would not be appropriate.

9. Facilities designated as noncommercial educational stations are confined to operation within the reserved portion of the FM band (Channels 201-220).<sup>8</sup> Only in very rare and exceptional circumstances will the Commission reserve a commercial channel for noncommercial use. Such a proponent must meet a stringent, two part showing:

1) no channels in the noncommercial educational band are available because of foreign allocations (Canadian or Mexican); or

2) no reserved band channels are available as the direct result of interference to operations on VHF Television Channel 6.

Collegeville, Minnesota, 10 FCC Rcd 3328 (1995). Even if all of the noncommercial channels are, in fact, affected by VHF Television Channel 6, there will be no reservation if the channel would also be precluded because of its proximity to other domestic existing FM licensees.<sup>9</sup> The preclusion of noncommercial channels must result solely and directly from either foreign

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<sup>6</sup> NPRM, p. 2.

<sup>7</sup> *Id.*

<sup>8</sup> 47 CFR §73.501.

<sup>9</sup> Request for reservation of Channel for noncommercial use found to be unacceptable and not placed on public notice where all noncommercial channels were found to be affected by Channel 6 interference, but also precluded from use because of other domestic existing FM licensees. Bulls Gap, Tennessee, 10 FCC Rcd 10444 n.1 (1995).

allocations or Channel 6 interference. To allow otherwise would foster an unacceptable patchwork of noncommercial stations within the commercial band. In the present case, the NPRM erroneously found that all noncommercial channels are precluded at Thorndale. NPRM, p. 3. However, even HCBI's engineer could not make that representation in the engineering statement attached to the HCBI Petition for Rule Making. According to HCBI's own engineer, allotting a noncommercial channel to Thorndale would only be "difficult" or not "workable."<sup>10</sup> As this language makes clear, Channel 6 considerations create only a "difficult" situation, but not one where the allotment of a noncommercial channel would be precluded by Channel 6 considerations, as is suggested in the NPRM.

10. The attached engineering statement demonstrates that noncommercial Channel 211A can be allotted to Thorndale, Texas in complete compliance with the Commission's rules, including the rules governing Channel 6 preclusion.<sup>11</sup> However, the existence of a viable noncommercial channel is an absolute bar to the reservation of a commercial channel for noncommercial use. Ukiah, California, 11 FCC Rcd 13933, 13935 (1996), *citing*, Collegeville, Minnesota, 10 FCC Rcd 3328 1995); Comobabi, Arizona, 47 FR 32717, July 29, 1982; Burlington and Newport, Vermont, 45 RR 2d 786 1979); Presque Isle, Maine, 36 RR 2d 840 (1976); Waco, Texas, 10 FCC 2d 865 (1967). Therefore, the HCBI Petition for Rule Making was accepted in error and the NPRM should

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<sup>10</sup> Engineering Statement of Lechman & Johnson, Inc. attached to the HCBI Petition for Rule Making as Exhibit 1, p. 2.

<sup>11</sup> Exhibit 1, p. 1.



not have been released. *Bulls Gap, Tennessee*, 10 FCC Rcd 10444 n.1 (1995) (request for reservation of commercial channel for noncommercial use found to be unacceptable and not placed on public notice).

11. Not only does Thorndale, Texas possess an available noncommercial channel, it also receives the signals of two noncommercial stations: KNCTFM on Channel 217C1 at Killeen, Texas, and KMFA(FM) on Channel 208C1 at Austin, Texas. Both provide a 60 dBu or better signal to Thorndale.<sup>12</sup> Given the existence of this noncommercial service, no reservation of a commercial channel is required at Thorndale, Texas and the NPRM was released in error. See, *Ukiah, California, supra*.

12. In sum, the NPRM is premised on the supposed need to reserve a commercial channel for noncommercial use at Thorndale, Texas. However, not all noncommercial channels are precluded from operation at Thorndale. Noncommercial Channel 211A can be assigned to Thorndale in complete compliance with the Commission's rules. Moreover, the community of Thorndale is served by two additional noncommercial FM stations. Therefore, the reservation of the channel was wholly inappropriate in the instant case and the NPRM was released in error and must be rescinded.

### **III. CONCLUSION**

13. The Allocations Branch erred in releasing an NPRM that is mutually exclusive with Cameron Broadcasting's existing construction permit for Channel 286C3. This error is compounded by the fact that a noncommercial channel is

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<sup>12</sup> Exhibit 1, p. 2.

available at Thorndale, a community served by two other noncommercial facilities. The HCBI petition for rule making should not have been accepted for rule making. Therefore, the NPRM must be rescinded.

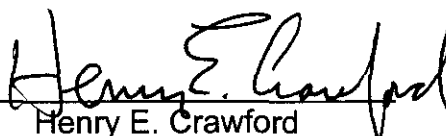
**WHEREFORE**, Cameron Broadcasting Company respectfully requests that the Commission rescind the Notice of Proposed Rule Making, DA 99-1292, released July 2, 1999 in MM Docket No. 99-243, RM-9675, and otherwise dismiss the rule making in its entirety.

August 2, 1999

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Respectfully Submitted,

Cameron Broadcasting Company

By:   
Henry E. Crawford  
Its Attorney

Cameron Broadcasting Company  
Petition for Reconsideration  
August 2, 1999

**EXHIBIT 1**

## **Engineering Statement**

July 29, 1999

We have been asked by Cameron Broadcasting Company ("Cameron Broadcasting") to prepare an engineering statement in connection with Cameron Broadcasting's Petition for Reconsideration of the Notice of Proposed Rulemaking released on July 2, 1999, in MM Docket No. 99-243, RM-9675 proposing the allotment of Channel 286A at Thorndale, Texas and reservation of the channel for noncommercial educational use.

Channel 286A at Thorndale, Texas, as proposed in the NPRM is mutually exclusive with Cameron Broadcasting's existing construction permit for Channel 286C3 at Cameron, Texas.

We have determined that a non-commercial FM educational channel is available to serve Thorndale, Texas. Our channel search has identified channel 211. When this channel is used at coordinates N. Lat. 30 41 58, W. Lng. 97 12 22, class A operation at an antenna height of 100 meters and a power of 300 watts is permitted under the rules. (See channel study in Attachment #1... This site is located 5.87 miles due north of Thorndale.) The resulting 60 dBu service area will cover all of Thorndale as well as the cities of Sharp and Davilla. (See Attachment #2.)

Since this site is within the Grade A of KCEN-TV6, Temple, TX, we looked at the channel-six TV interference implications. Based on section 73.525 of the Commission's rules, the TV-6 protection U/D ratio for channel 211 is +1.65 dB. Since the KCEN-TV signal at the proposed allocation site is 71.15 dBu, the NCE FM station will have a "worst case" interference signal contour to 72.8 dBu (in the direction toward KCEN.) This signal contour has been plotted on the map in attachment #2 using a study power for mixed polarization of 330 watts ( $P_{wV} + P_{wH}/10$ ). The map also shows population centroids from the U.S. 1990 Census (i.e. plus marks with whole numbers representing population count within centroid.) It can be seen that there are no population centroids found within the allocation's 72.8 dBu signal contour, therefore no channel-six TV interference will be caused.

Consequently, channel 211, as defined above, could be used at Thorndale, Texas to support a 300 watt, 100 meters HAAT, non-commercial educational, class A FM radio station.

In addition to the above, we have found that the city of Thorndale receives a better than 60 dBu signal from class C1 noncommercial KNCTFM, Killeen, Texas on Channel 217 and a 60 dBu signal from class C1 KMFA, Austin, Texas, on channel 208.

Doug Vernier

Roy Henderson  
Study at Thorndale TX

REFERENCE CH# 211A - 90.1 MHz, Pwr= 0.3 kw, HAAT=100.5 M, COR= 237 M      DISPLAY DATES  
30 41 58 N      Average Protected F(50-50)= 13.49 km      DATA 07-16-99  
97 12 22 W      Ave. F(50-10) 40 dBu= 46.4 54 dBu= 20.2 80 dBu= 4.3 100 dBu= 1.2      SEARCH 07-16-99

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CH CITY	CALL	TYPE STATE	AZI. <--	DIST FILE #	LAT. LNG.	Pwr(kw) HAAT(M)	COR(M) INT(km)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
210C2 Temple	*KBDE.C	CPM DVN TX	347.0 167.0	64.72 BMPED980501MB	31 16 05 97 21 34	6.822 137	361 51.0	33.6 American Family Associatio	0.54	11.34
> Reference HAAT at 347.0°= 96.3 M, Pwr= 0.3 kw, Pro. Dist. = 13.2 km, Int Dist. = 19.75 km Vertical Polarization Only										
211C Dallas	KERA	LI CY TX	6.5 186.5	209.73 BLED1280	32 34 43 96 57 12	100.000 384	581 181.5	78.6 North Texas Public Broadca	14.75	84.79
211C1 Houston	KPFT.A	AP CN TX	118.8 298.8	185.29 BPED970527IE	29 53 14 95 31 22	100.000 205	233 162.4	64.3 Pacifica Foundation	9.40	74.65
211C1 Houston	KPFT	LI CN TX	118.8 298.8	185.29 BLED970910KE	29 53 14 95 31 22	28.000 205	233 131.7	52.5 Pacifica Foundation	40.08	86.38
210C3 College Station	AP210	AP DVN TX	108.4 288.4	77.95 BPED970828MA	30 28 33 96 26 08	8.500 103	175 48.2	31.1 Hymn Time, Inc.	16.23	26.62
Vertical Polarization Only										
208C1 Austin	*KMFA	LI CN TX	233.8 53.8	70.77 BLED921217KB	30 19 20 97 48 03	65.000 259	478 8.4	64.7 Capitol Broadcasting Assoc	49.59	4.81
> Reference HAAT at 233.8°= 90.6 M, Pwr= 0.3 kw, Pro. Dist. = 12.81 km, Int Dist. = 1.21 km										
213C1 Austin	*KUT	LI CN TX	236.0 56.0	76.41 BLED820909AF	30 18 51 97 51 58	100.000 245	452 30.4	67.8 The University of Texas at	33.46	4.64
> Reference HAAT at 236.0°= 87.2 M, Pwr= 0.3 kw, Pro. Dist. = 12.58 km, Int Dist. = 3.97 km										
210A Bryan / College Sta	AP210	AP VN TX	93.6 273.6	82.30 BPED970912MA	30 39 02 96 20 57	0.125 155	242 20.3	13.5 Educational Media Foundtn	48.50	48.54
Vertical Polarization Only Returned 980629										
211C2 Ingram	KTXI	LI DCN TX	250.2 70.2	191.50 BLED980922KH	30 06 14 99 04 36	50.000 138	704 136.1	50.6 Texas Public Radio	41.94	94.58
264C Austin	KASE	LI CN TX	233.8 53.8	70.77 BLH940407KD	30 19 20 97 48 03	59.000 260	478 0.0	63.9 KVET Broadcasting Company,	29.0R	41.8M
*** This license is for an AUXILIARY facility of KASE, Austin, Texas. ***										
264C Austin	KASE	LI CN TX	233.8 53.8	70.77 BLH971202KB	30 19 20 97 48 03	85.000 235	453 0.0	65.4 Butler Broadcasting Compan	29.0R	41.8M
264C Austin	KASE	LI CY TX	233.6 53.6	71.01 BLH820628AN	30 19 10 97 48 06	100.000 363	584 0.0	77.0 KVET Broadcasting Company,	29.0R	42.0M
06+2C TEMPLE	*KCEN TV	LI HY TX	358.8 178.8	63.64 BLCT811231KH	31 16 24 97 13 14	100.000 580	756 163.4	126.7 CHANNEL 6, INC.	To Grd B=	-63.11
> Reference HAAT at 358.8°= 103.8 M, Pwr= 0.3 kw, Pro. Dist. = 171.59 km, Int Dist. = 231.89 km										

\* = ERP and HAAT on direct line to and from reference station.

## HOW TO READ THE FM COMPUTER PRINT-OUT

The computer printout should be self-explanatory for the most part. The parameters of the station being checked, (reference station) are printed in the heading. The 60 dBu protected contour is predicted from the Commission's F(50-50) table, while the 40, 54, 80 and 100 dBu contours are interference contours derived from the Commission's F(50-10) table. Contour distances are in kilometers and are predicted using spline interpolation from data points identical to those published in Report No. RS 76-01 by Gary C. Kalagian. Critical contour distances are determined using the Commission's TVFMINT FORTRAN subroutine. When interference contour distances are less than 16 kilometers the F(50-50) tables are used. If signal contour distances are less than 1.6 km the free-space equation is used.

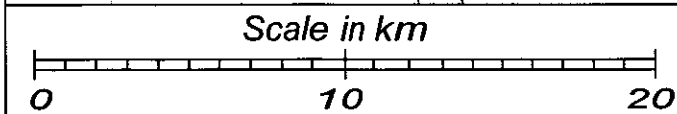
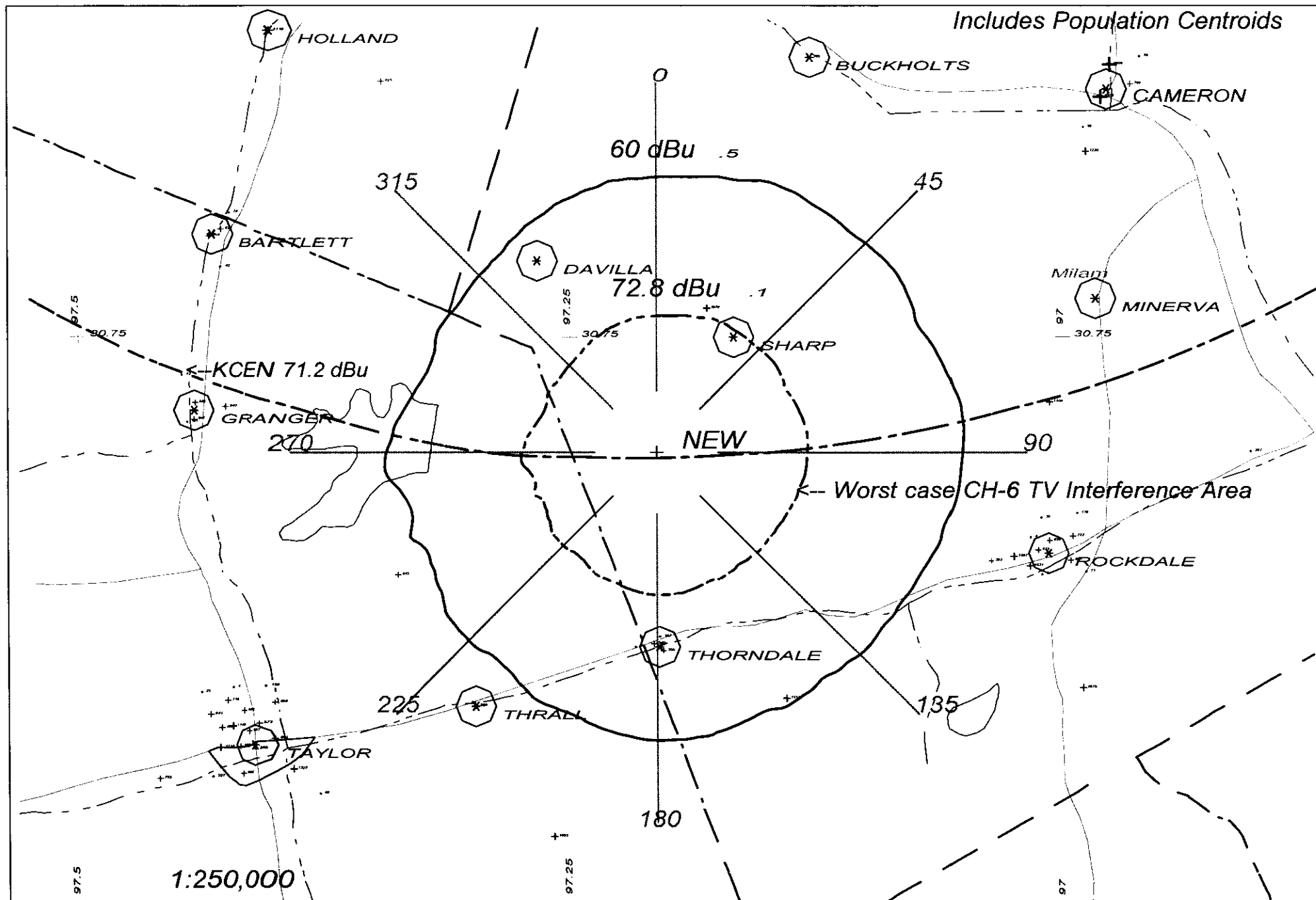
The column listed **"\* IN \***" is the sum of the reference station's 60 dBu protected contour and the data file station's interference contour subtracted from the distance between the stations. (All distances are derived by the method detailed in Sec. 73.208 of the Rules and Regulations as amended in Docket 80-90.) Therefore, the column is a measure of incoming interference. Negative distances in this column indicate the presence of interference. Listed antenna heights are the average heights of eight standard radials as found in the Commission's records unless otherwise noted, in which case the specific antenna heights along the azimuths between the reference station and the database station are used and visa versa. The column labeled **"\* OUT \***" shows the distance of kilometers of overlap or clearance between the reference station's interference contour and the database station's protected contour. Negative distance figures in this column indicate outgoing interference.

Under the "AZIMUTH" column, the first row of numbers indicate the bearings from true north of the data base stations in relationship with the reference station, while the numbers in the second row indicate the reverse bearings from the database station to the reference station.

The columns labeled "INT" and "PRO" hold the distance in kilometers of the appropriate interference contour and the protected contour of a data base station.

For I.F. relationships the "IN" and "OUT" columns change their significance. The letter "R" stands for the minimum **required** distance in kilometers, while the letter "M" in the next column follows the **available clear space** separation in kilometers. Minimum separation distances when displayed are taken from Sec 73.207 of the rules as amended. Canadian and Mexican separation distances, U/D ratios and protected contour values are from the US/Mexican Working Agreement and the US/Canada Working Agreement".

The first three letters of the "TYPE" column identify the current FCC status of the stations. The fourth letter will be a "D" or "Z" (Sec. 73.215) if the facility is directional. The fifth letter will be an E, H or V depending on the type of antenna polarization. The sixth letter will be a "Y" if the antenna uses beam tilt.



NEW 211D .3kW 237M AMSL  
N. Lat. 30 41 58 W. Lng. 97 12 22

THORNDALE, TX  
D. Vernier - 07/99



**Declaration:**

I, Doug Vernier, declare that I have received training as an engineer from the University of Michigan School of Engineering. That, I have received degrees from the University in the field of Broadcast Telecommunications. That, I have been active in broadcast consulting for over 25 years;

That, I have held a Federal Communications Commission First Class Radiotelephone License continually since 1964. In 1985, this license was reissued by the Commission as a lifetime General Radiotelephone license no. PG-16-16464;

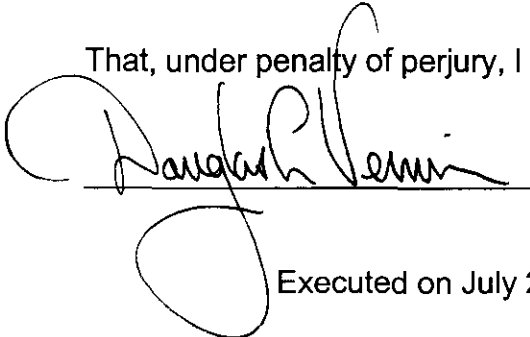
That, I am certified as a Professional Broadcast Engineer (#50258) by the Society of Broadcast Engineers, Indianapolis, Indiana. (Re-certified 11/95.)

That, my qualifications are a matter of record with the Federal Communications Commission;

That, I have been retained by Cameron Broadcasting Company and as such have prepared the engineering showings appended hereto;


That, I have prepared these engineering showings, the technical information contained in same and the facts stated within are true of my knowledge;

That, under penalty of perjury, I declare that the foregoing is correct.

 Douglas L. Vernier

Executed on July 29, 1999

Subscribed and sworn before me this 29th day of July, 1999.

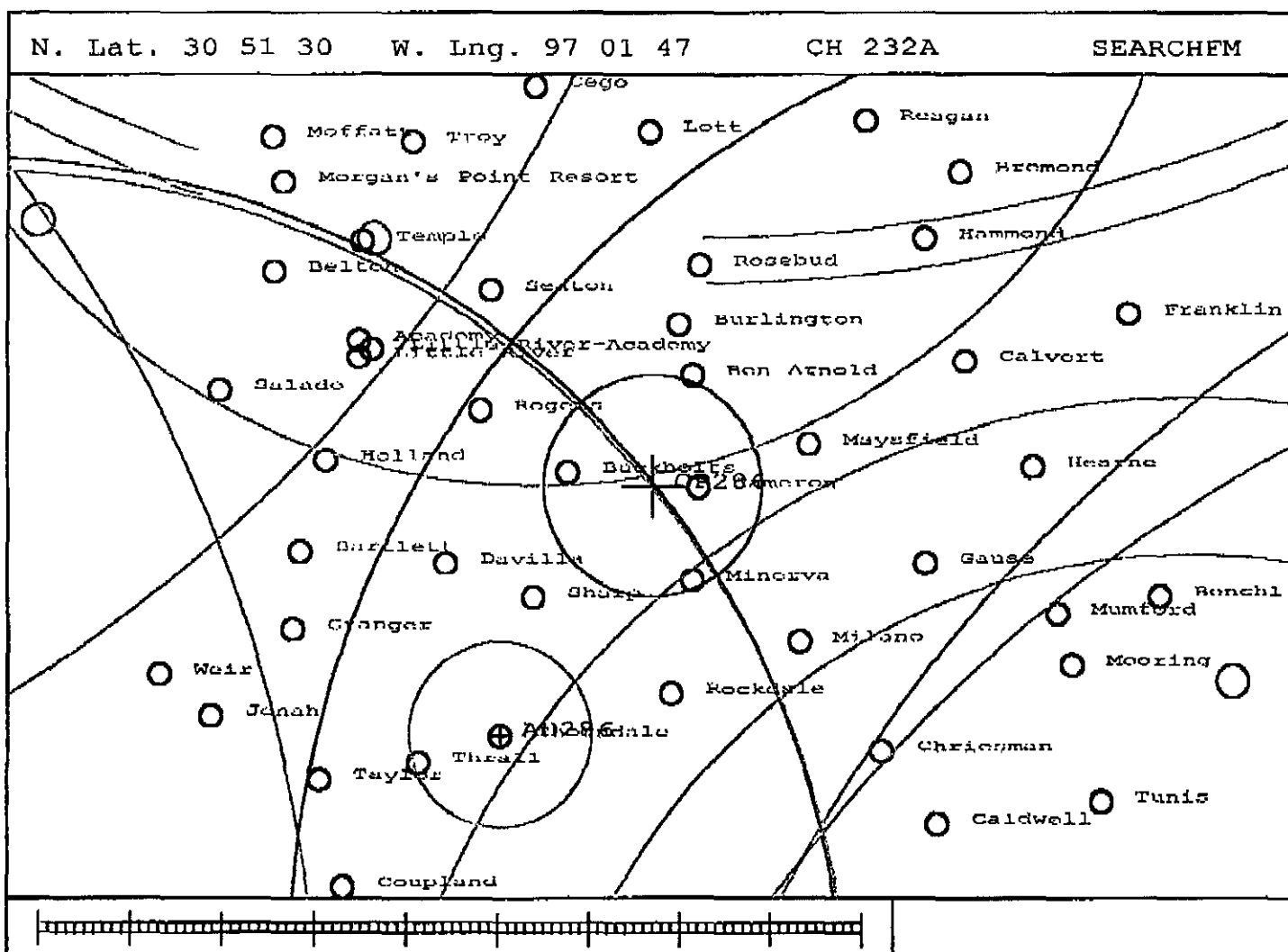
  
Notary Public in and for the State of Iowa

My Commission Expires August 10, 2001

Cameron Broadcasting Company  
Petition for Reconsideration  
August 2, 1999

**EXHIBIT 2**

## BAYPORT FREQUENCY MODULATION STUDY



232A Channel Study @ original Channel & Site  
KHTZ-FM , Cameron, TX

Call	CH#	Location		D-KM	Azi	FCC	Margin
ALOPEN	231C2	Brenham	TX	84.13	127.9	106.0	-21.87
KULF.A	231C2	Brenham	TX	84.13	127.9	106.0	-21.87
CP286	286C3	Cameron	TX	0.00	0.0	12.0	-12.00
KAMX	234C	Luling	TX	94.72	231.3	95.0	-0.28
KAMX.A	234C	Luling	TX	94.72	231.3	95.0	-0.28
KLBJFM	229C	Austin	TX	95.12	230.3	95.0	0.12
KBCT	233A	Waco	TX	73.28	349.8	72.0	1.28
KULF.C	231C3	Brenham	TX	98.85	143.4	89.0	9.85
AD286	286A	Thorndale	TX	31.77	211.8	10.0	21.77
KLTY.C	231C	Fort Worth	TX	187.17	1.8	165.0	22.17
KULF	231A	Brenham	TX	98.85	143.4	72.0	26.85
KLTY	231C	Fort Worth	TX	192.03	1.7	165.0	27.03
KYOX.C	232C2	Comanche	TX	197.09	307.0	166.0	31.09
KLDE	233C	Houston	TX	201.04	127.0	165.0	36.04
KLDE	233C	Houston	TX	203.99	133.9	165.0	38.99
KRVL	232C2	Kerrville	TX	212.75	252.0	166.0	46.75

## CERTIFICATE OF SERVICE

I, Henry E. Crawford, do hereby certify that copies of the foregoing Petition for Reconsideration have been served by United States mail, postage prepaid this 2nd day of August, 1999 upon the following:

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